

In July, the ~~Seldin/Haring-Smith Foundation~~[Seldin/Haring-Smith Foundation](#) published a [report examining sex trafficking in higher education](#). The report was featured in a [front-page story by USA Today](#), and prompted an investigation by the House Oversight Committee. We found that a set of state authorizers and massage education experts believe sex trafficking to be a widespread problem in vocational schools, particularly in fields like massage therapy and cosmetology. Our report explored a Minnesota case where a state authorizer ordered the closure of an institution due to an explicit suspicion of sex trafficking, and the subsequent processes that enabled that school to continue operations without losing Title IV eligibility. In this case, the regulatory triad functioned exactly as designed: an exemplary state authorizer identified areas of non-compliance, notified the accreditor and the U.S. Department of Education, and ordered the closure of the school.

At the same time, we are concerned that the accreditor was unwilling to share information about this case with us in the course of our research. The accreditor, the Accreditation Commission for Acupuncture & Oriental Medicine (ACAOM), took initial action with an Order to Show Cause within one week of the authorizer's revocation order, and the school was ultimately placed on probation in August 2020. The probation for the school was extended in March 2021, and is due for review in August 2021. It is not clear if the accreditor conducted any investigation as a result of the state authorizer's suspicion of sex trafficking; we contacted the Commission, and we were told that the institution's full accreditation record is confidential. It is certainly possible that the accreditor in this case conducted an investigation and did its due diligence--but we cannot verify that.

Our report raises questions about the role of accreditors in dealing with this issue, and the lack of transparency from the accreditor in this case is troubling. In our broader research, we found a number of currently operating schools that have been unapproved by a voluntary massage therapy certification board, yet retained approval with their accreditors. As the arbiters of educational quality, accreditors must be vigilant in ensuring that their schools are not engaged in criminal behavior and transparent about their review of schools that have been disciplined or disapproved of by other regulatory agencies— especially for actions as severe as sex trafficking of students.

We urge NACIQI to press the accreditors to disclose their methods and processes for identifying schools at risk for trafficking related activities, as well as other criminal conduct. The lack of publicly available information about this particular case--or this issue in general-- both leaves students in the dark about the schools they are choosing, and impairs the ability of other regulatory bodies to take action to protect students.